

**HEARING DATE AND TIME: June 15, 2010 at 9:45 a.m. (Eastern Time)**  
**OBJECTION DEADLINE: June 8, 2010 at 4:00 p.m. (Eastern Time)**

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IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK

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In re:	:	Chapter 11
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MOTORS LIQUIDATION COMPANY, <i>et al.</i> ,	:	Case No. 09-50026 (REG)
f/k/a GENERAL MOTORS CORP., <i>et al.</i> ,	:	
	:	
Debtors.	:	(Jointly Administered)
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**NOTICE OF MOTION OF GENOVEVA BERMUDEZ TO FILE LATE PROOF OF CLAIM OR, IN THE ALTERNATIVE, TO AMEND INFORMAL PROOF OF CLAIM**

PLEASE TAKE NOTICE that upon the annexed motion, dated May 10, 2010 (the “Motion”), of Genoveva Bermudez (the “Movant”) to File Late Proof of Claim or, in the Alternative, to Amend Informal Proof of Claim, a hearing will be held before the Honorable Robert E. Gerber, United States Bankruptcy Judge, in Room 621 of the United States Bankruptcy Court for the Southern District of New York, One Bowling Green, New York, New York 10004, on **June 15, 2010 at 9:45 a.m. (Eastern Time)**, or as soon thereafter as counsel may be heard.

PLEASE TAKE FURTHER NOTICE that any responses or objections to the Motion must be in writing, shall conform to the Federal Rules of Bankruptcy Procedure and the Local Rules of the Bankruptcy Court, and shall be filed with the Bankruptcy Court (a) electronically in accordance with General Order M-242 (which can be found at [www.nysb.uscourts.gov](http://www.nysb.uscourts.gov)) by registered users of the Bankruptcy Court's filing system, and (b) by other parties in interest, on a 3.5 inch disk, preferably in Portable Document Format (PDF), Word Perfect, or any other Windows-based word processing format, and served in accordance with General Order M-182 (which can be found at [www.nysb.uscourts.gov](http://www.nysb.uscourts.gov)), and served in accordance with General Order M-242, and on Schnader Harrison Segal & Lewis LLP, 1600 Market Street, Suite 3600, Philadelphia, Pennsylvania 19103 (Attn: Barry E. Bressler, Esquire and Richard A. Barkasy, Esquire) so as to be received no later than **June 8, 2010 at 4:00 p.m. (Eastern Time)** (the "Objection Deadline").

If no objections are timely filed and served with respect to the motion, the Movant may, on or after the Objection Deadline, submit to the Bankruptcy Court an order substantially in the form of the proposed order attached to the Motion, which order may be entered with no further notice or opportunity to be heard offered to any party.

SCHNADER HARRISON SEGAL  
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Dated: May 10, 2010

By: /s/ Benjamin P. Deutsch  
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